

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

NEWTOWN ATHLETIC CLUB  
(Newtown Racquetball Associates LLC,  
Newtown Racquetball Inc.),

Plaintiff,

v.

THE CINCINNATI INSURANCE  
COMPANIES,

Defendant.

Civil Action No.  
2:21-cv-02662 (CMR)

**NOTICE OF MOTION  
TO REMAND**

**TO THE HONORABLE COURT AND TO ALL PARTIES:**

**PLEASE TAKE NOTICE** that, pursuant to Federal Rule of Civil Procedure 7(b) and Local Rule 7.1, Plaintiff Newtown Athletic Club (“Newtown”), by and through its undersigned counsel, shall move before this Court, located at the James A. Byrne U.S. Courthouse, 601 Market Street, Philadelphia, PA 19106, Courtroom 12-A, on the next available motion date for an Order remanding this case to the Court of Common Pleas of Bucks County, Pennsylvania.

**PLEASE TAKE FURTHER NOTICE** that in support of its Motion, Newtown shall rely on the accompanying Memorandum of Law, Declaration of Pamela D. Hans, Esq., and the accompanying exhibit, Proposed Order, as well as upon the pleadings and all prior proceedings in the above-captioned action.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested for this Motion.

Dated: July 6, 2021

ANDERSON KILL P.C.

By: /s/ Pamela D. Hans

Pamela D. Hans, Esq.

(Attorney I.D. No. 88138)

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\* *Pro Hac Vice* forthcoming.

\*\*Admission to this Court pending.

*Attorneys for Plaintiff  
Newtown Athletic Club*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of July 2021, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Eastern District of Pennsylvania using the Electronic Filing system which will send by electronic mail a notice of electronic filing to all counsel of record.

Dated: Philadelphia, Pennsylvania  
July 6, 2021

ANDERSON KILL P.C.

By: /s/ Pamela D. Hans

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